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Amendment and/or Response
Reply to Office action of 6 April 2005

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REMARKS / DISCUSSION OF ISSUES

Claims 1-28 are pending in the application.

Claim 1 is amended to correct a typographical error; no new matter is added, and the scope of the claim is unchanged.

The Examiner is respectfully requested to state whether the drawing is acceptable.

The Office action rejects claims 6, 7, and 17 under 35 U.S.C. 112, second paragraph. The applicant respectfully traverses this rejection.

The Office action asserts that the claimed "trajectory parameters" and "latency parameter that correspond to a delay associated with processing the information" is not found and described within the specification. The applicant respectfully disagrees with this assertion. The following references to the text of the applicant's specification are examples of where the information can be found in the specification, but are not intended to limit the scope of the claims, or the terms, to these examples.

In the applicant's paragraph 0007, the applicant teaches "Dynamic performance is also calibrated by placing RFID tags on visually apparent moving targets and using the location information determined from the video surveillance system to determine the parameters used to qualify subsequent RFID location estimates of moving targets." The applicant respectfully maintains that "parameters used to qualify subsequent RFID location estimates of moving targets" are examples of "trajectory parameters". Further, in paragraph 0025, the applicant teaches that "the calibration module 150, and/or each of the coordinate determinators 130, 180, provides an estimate of the object's location, based on the predicted path of the object, using techniques common in the art". The applicant respectfully maintains that "a predicted path" of an object corresponds to a "trajectory" of the object.

In the applicant's paragraph 0023, the applicant teaches "the coordinates of a moving RFID tag from the RFID tracking system are likely to lag the visible location of the RFID tag in the camera images, and the calibration module 150 is configured to apply suitable adjustments to synchronize the reported coordinates from each determinator 130, 180 to the

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images from the camera." In the applicant's paragraph 0024, the applicant teaches "the accuracy and lag in reporting the location of an RFID tag can be expected to increase as the number of other RFID tags being concurrently processed increases." The applicant respectfully maintains that the referenced "lag" of the RFID location determination caused by concurrently processing other RFID tags is an example of a "latency parameter that corresponds to a delay associated with processing the information", as claimed.

The Office action rejects claims 1 and 3 under 35 U.S.C. 102(e) over Kikinis (USP 6,778,171). The applicant respectfully traverses this rejection.

The applicant respectfully notes that the rejection of claim 3 is inappropriate, because claim 3 depends upon claim 2, and the Office action does not reject claim 2 under 35 U.S.C. 102(e). If claim 2 is not rejected under 35 U.S.C. 102(e), any claim that is dependent upon claim 2 can not be rejected under 35 U.S.C. 102(e).

Claim 1, upon which claims 2-10 depend, claims a surveillance system that includes a video surveillance system that identifies a visual-object based on image information provided by one or more cameras, an RF surveillance system that identifies an RF-object based on reception information provided by a plurality of receivers, and an object linker, operably coupled to the video surveillance system and the RF surveillance system, that is configured to link the visual-object to the RF-object.

Kikinis does not teach a video surveillance system that identifies a visual-object, and does not teach an object linker that links the visual-object to the RF-object. Kikinis's system does not identify a visual-object based on information provided by a camera. Kikinis uses RFID coordinate determination information to identify a location of an object associated with the RFID device. Based on this RFID-determined coordinate information, a virtual image frame is created, and one or more cameras are adjusted to contain the image frame in the camera(s) field of view.

Kikinis relies upon the assumption that, by pointing the camera at the determined location of the RFID object, the object associated with the RFID object will be contained in the camera image. Kikinis does not teach locating an object in the camera's field of view and linking such an object to the detected RFID-object. The cameras are calibrated to accurately

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point to given locations, but this calibration is not dependent upon a detected RFID-object. Once the cameras are calibrated, Kikinis' system merely points the camera to the determined location, and does not determine and/or verify that an object corresponding to the detected RFID device is also located in the video image.

Because Kikinis fails to teach a surveillance system that identifies a visual-object based on image information provided by one or more camera and an object linker that links the visual-object to an RF-identified-object, as specifically claimed by the applicant, the applicant respectfully requests the Examiner's reconsideration of the rejection of claims 1 and 3 under 35 U.S.C. 102(e) over Kikinis.

The Office action rejects claims 2, 4-10, 12-13, 15-17, 19, 21, and 23-28 under 35 U.S.C. 103(a) over Kikinis. The applicant respectfully traverses these rejections.

Each of the rejected claims include a determination of a first location based on a visual-object and a determination of a second location based on an RF-object, and determining correction parameters to align these locations. As noted above, Kikinis does not teach identifying a visual-object in a visual image, and specifically does not teach determining a location of such a visual-object in the visual image, and thus cannot be said to teach determining correction parameters based on these first and second locations.

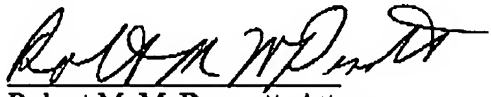
Because Kikinis does not teach determining a location of a visual-object in a visual image, and does not teach adjustment parameters based on such a determined location, the applicant respectfully maintains that the Office action fails to establish a prima facie case of obviousness, and respectfully requests the Examiner's reconsideration of the rejection of claims 2, 4-10, 12-13, 15-17, 19, 21, and 23-28 under 35 U.S.C. 103(a) over Kikinis.

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In view of the foregoing, the applicant respectfully requests that the Examiner withdraw the rejections of record, allow all the pending claims, and find the application to be in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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